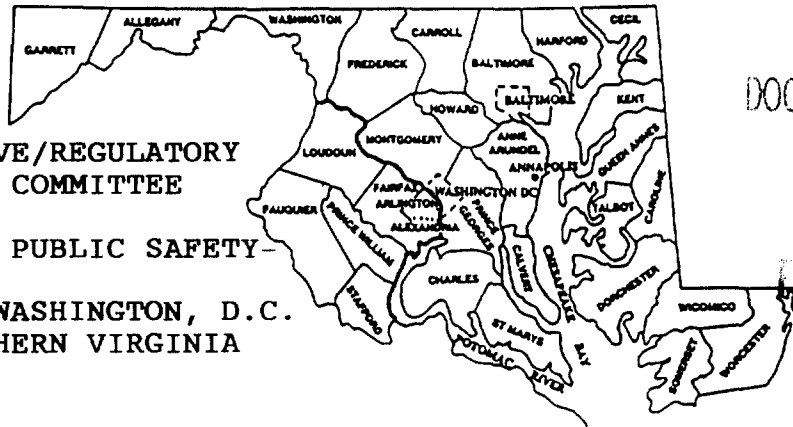


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LEGISLATIVE/REGULATORY
AFFAIRS COMMITTEE
-REGION-20 PUBLIC SAFETY-
MARYLAND, WASHINGTON, D.C.
AND NORTHERN VIRGINIA



MAR 29 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Instituting a Simplified)
Program for Licensing Personnel)
Engaged in the Installation,)
Servicing and Maintenance of)
Radio Systems Designed to)
Operate on Private Land Mobile)
Radio Service Frequency Bands)

RM-8680

WRITTEN EX PARTE PRESENTATION

Submitted by:

Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

March 29, 1996

021



PRESIDENT (CY '94)
ALEXANDRIA MEDICAL SOCIETY, INC.

CLINICAL INSTRUCTOR
GEORGETOWN UNIVERSITY SCHOOL OF MEDICINE

MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)

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Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

Date: March 29, 1996

I. EX PARTE

1. Before the Federal Communications Commission (Commission) is a PETITION FOR RULE MAKING (PETITION), RM-8680, proposing the reinstitution of a program that would require the mandatory licensing of radio technicians.

2. Pursuant to the authority given by the Commission under the Report and Order in General Docket No. 87-112 1/, the Region-20 Public Safety Planning Committee was created to address the future communications needs and concerns of the PSRS users for Region-20. The obligations of that Committee included the submission to the Commission of a Region-20 Public Safety Radio Communications Plan (Region-20 Plan) 2/ and establishment of a Region-20 Public Safety Review Committee (Committee) to oversee its implementation.

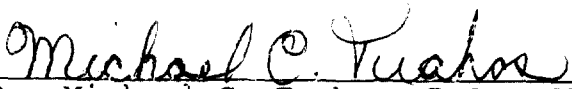
3. This Committee, representing the PSRS/governmental constituents for Region-20, submitted timely filed **REPLY COMMENTS** in response to a NOTICE OF INQUIRY, PP Docket No. 96-17, in the matter of improving Commission processes. Issued discussed in those **REPLY COMMENTS** have a direct relationship to the RM-8680 Petition.

1/ REPORT AND ORDER, GN Docket No. 87-112, FCC 87-359, Paragraph 4.

2/ WASHINGTON, D.C. METROPOLITAN AREA - REGION 20, GN Docket No. 90-7, DA 90-28, January 17, 1990

4. This Committee hereby requests that the attached PP Docket No. 96-17 REPLY COMMENTS be entered into the RM-8680 formal record as a WRITTEN EX PARTE submission. Their inclusion serves to further complete the RM-8680 record and is therefore in the **public interest.**

Respectfully submitted,


Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-2G Legislative/
Regulatory Affairs Committee

II.

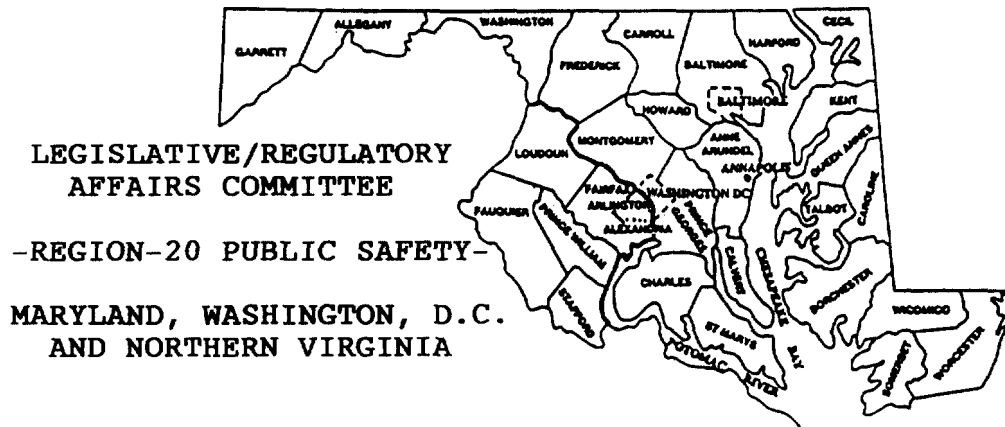
CERTIFICATE OF SERVICE

I, Dr. Michael C. Trahos, pursuant to 47 CFR 1.405, do hereby certify that a copy this WRITTEN EX PARTE PRESENTATION has been sent to following entity on the day and date first above written.

- 1). Frederick J. Day, Esquire
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.
1110 N. Glebe Road, Suite 500
Arlington, Virginia 22201-5720

Respectfully,


Dr. Michael C. Trahos, D.O., NCE, CET



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) PP Docket No. 96-17
IMPROVING COMMISSION PROCESSES)

REPLY COMMENTS

Submitted by:

Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

March 29, 1996



PRESIDENT (CY '94)
ALEXANDRIA MEDICAL SOCIETY, INC

CLINICAL INSTRUCTOR
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MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) GN Docket No. 96-17
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REPLY COMMENTS

Submitted by: Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

Date: March 29, 1996

I. INTRODUCTION

1. Before the Federal Communications Commission (Commission) is a NOTICE OF INQUIRY (NOI) to improve Commission processes.

2. Pursuant to the authority given by the Commission under the Report and Order in General Docket No. 87-112 1/, the Region-20 Public Safety Planning Committee was created to address the future communications needs and concerns of the PSRS users for Region-20.

The obligations of that Committee included the submission to the Commission of a Region-20 Public Safety Radio Communications Plan (Region-20 Plan) 2/ and establishment of a Region-20 Public Safety Review Committee (Committee) to oversee its implementation.

3. This Committee, representing the PSRS/governmental constituents for Region-20, hereby submits the following timely filed **REPLY COMMENTS** in response to comments submitted to this NOI.

II.

REPLY COMMENTS

4. This Committee has long been concerned about the escalating unlicensed telecommunications operations occurring in the 47 CFR Part 80 (Maritime), Part 90 (Private Land Mobile) and Part 95 (General Mobile) radio services. This concern stems from Region-20 member entities having to operate within these various radio services.

5. This Committee is well aware of Congress' cuts in the Commission's fiscal budget. However, with the lack of adequate funding of the Compliance and Information Bureau (CIB), the user community, and in particular unscrupulous technicians and vendors, have found enormous profits in the deliberate violation of the unenforced Commission's Rules.

6. On March 25, 1994, the Industrial Telecommunications Association, Inc. (ITA) had submitted a PETITION FOR RULE MAKING, RM-8680, requesting that the Commission reinstitute a program for the licensing of radio technicians.^{3/} In response to this NOI, ITA filed comments expounding upon the issues raised in paragraphs 4 and 5, supra.^{4/}

7. ITA had filed RM-8680 because of the perceived relationship between "technician licensing and the level of

compliance with the station licensing requirement."5/ In its comments to this NOI, ITA reiterates that:

"the proposed [technician] licensing requirement is necessary to discourage the activities of individuals who promote, either directly or indirectly, unlicensed operations on the private land mobile frequency bands."6/

8. This Committee concurs with ITA's views and assessments, and fully supports the reinstitution of a program that requires the mandatory Commission licensing of all radio technicians. Such a program will significantly curb unscrupulous and illegal activity through Commission sponsored enforceable radio technician accountability.

9. In the NOI, the Commission is considering the privatization of CIB enforcement activities. However, without concomitant enforceable accountability through a mandatory Commission radio technician licensing process, any attempt at CIB enforcement privatization will ultimately fail.

10. This Committee is aware of a recent Wireless Telecommunications Bureau (WTB) order, DA 95-519, that denied a Petition for Rule Making, RM-8400, which requested the establishment of First and Second Class Radiotelephone operator licenses. The Commission denied RM-8400, in part, because there was no apparent regulatory benefit to WTB to do so.

11. However, what the Commission needs to realize is that what may not have regulatory benefit to one Bureau can have regulatory benefit to another Bureau. This issue of reinstituting radio technician licensing is such an example.

12. The WTB has been delegated the duties of issuing both station and commercial radio operator licenses. However, it is CIB's duties to enforce the Commission's rules. Though there may not be a perceived regulatory benefit to WTB to reinstitute a program that requires the mandatory Commission licensing of all radio technicians, the benefit to CIB is obvious by furthering their ability to enforce the Commission's rules by making radio technicians accountable for unscrupulous and illegal activity.


III.

CONCLUSION

13. This Committee supports the reinstitution of a program that requires the mandatory Commission licensing of all radio technicians. It is felt that with such a program, the escalating unlicensed and illegal telecommunications operations in this country can be curbed.

14. This Committee would find it appropriate for the Commission to issue a NOTICE OF PROPOSED RULE MAKING, using RM-8680 as the foundation, to reinstitute a program that requires the mandatory licensing of all radio technicians. Such a NPRM should be adopted as soon as possible, prior to any consideration of privatizing CIB enforcement activities, and would be in the **public interest.**

Respectfully submitted,


Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-20 Legislative/
Regulatory Affairs Committee

IV.

FOOTNOTES

- 1/ REPORT AND ORDER, GN Docket No. 87-112, FCC 87-359, Paragraph 4.
- 2/ WASHINGTON, D.C. METROPOLITAN AREA - REGION 20, GN Docket No. 90-7, DA 90-28, January 17, 1990.
- 3/ PETITION FOR RULE MAKING, RM-8680, Industrial Telecommunications Association, Inc., March 25, 1994; Public Notice, Report No. 2090, 55242, August 11, 1995.
- 4/ COMMENTS, PP Docket No. 96-17, Industrial Telecommunications Association, Inc., March 18, 1996, Paragraphs 32, 33, & 34.
- 5/ Ibid., Paragraph 34.
- 6/ Ibid.